

ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION
2017 DEC 11 PM 3:27
CLERK OF COURT

UNITED STATES OF AMERICA

v.

DAVID BRADLEY HUGHES (03)
a/k/a "Little Baby Huey"

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Criminal No. 4:17-CR-158-A
Judge McBryde

**DEFENDANT DAVID BRADLEY HUGHES' MOTION FOR
DOWNWARD DEPARTURE**

1. Defendant, David Bradley Hughes, by and through attorney of record Brian W. Salvant, moves this Court for a Downward Departure. In consideration of the substantial assistance Hughes provided in the case of *United States v. Hughes, ET AL*, Cause No. 4:17-CR-158-A the defendant asks for a downward departure below the statutory maximum of 5 years-40 years.
2. In September of 2017, Hughes on his own volition had an open talk with the DEA.
3. The Defendant was debriefed concerning his activities and his role in the conspiracy. Defendant was truthful and cooperated fully.

4. Defendant was one of several cooperating defendants that pled guilty and cooperated with the government.

5. Defendant's role in the conspiracy was significantly less culpable than that of other defendants. The defendant submits it would be appropriate for his sentence to reflect that lessor role.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on 12/11/17, the foregoing Defendant's the Motion for Downward Departure was sent by first class mail to the Shawn Smith, Assistant United States Attorney, Burnett Plaza, Suite 1700 801 Cherry Street, Unit 4 Fort Worth, Texas 76102.



Brian W. Salvant